

### REMARKS

In an Office Action dated November 26, 2002, the drawings were objected to; claims 1-23 were rejected under 35 U.S.C. § 112, ¶ 1; claims 1-26 were rejected under § 102 over U.S. Patent No. 5,964,296 (Ross); and claims 1-17 and 20-23 were rejected under § 102 over U.S. Patent 6,457,521 (Langseth).

### OBJECTION TO DRAWINGS

New Figure 11 has been added that shows an intelligent device disposed within the sand screen. Support for new Figure 11 and the corresponding passages added to the specification can be found on the last two lines of page 4 of the present specification. Also, claim 10 of the original parent application (Serial No. 09/631,859), which forms part of the disclosure of the application as originally filed, also provides support for new Figure 11. Therefore, no new matter has been added in new Figure 11. With new Figure 11, the objection to the drawings with respect to the intelligent device being within the screen has been overcome.

Claims 22 and 23 have been cancelled to render the objection of drawings with respect to those claims moot.

### REJECTION UNDER 35 U.S.C. § 112, ¶ 1

With the addition of new Figure 11, which is supported by the disclosure as originally filed, it is respectfully submitted that this rejection has also been overcome.

### REJECTION UNDER 35 U.S.C. § 102

Claims 1-26 were rejected as being anticipated by Ross.

Ross does not disclose an intelligent completions device *disposed in a sand screen*, as recited in claim 1.

The intelligent completions device recited in claim 1 was equated with fluid property sensor 78 shown in Figure 2 of Ross. The fluid property sensor 78 is part of an apparatus 40 that

is installed in a service tool 10a, shown in Figures 1A-1B of Ross. The apparatus 40 is installed in the service tool 10a in place of a plug 36 (*see* Figure 1B of Ross). Note that the plug 36 is some distance above a sand screen 26 shown in Figure 1B. Thus, Ross does not disclose an intelligent completions device disposed *in* a sand screen.

The ordinary meaning of the word "in" is "used as a function word to indicate inclusion, location, or position within limits." Merriam-Webster Dictionary, printed from <http://www.m-w.com/cgi-bin/dictionary> (attached hereto). As disclosed in Ross, the sensor 78 is not included, located, or positioned within limits of the screen 26. Therefore, claim 1 is not anticipated by Ross.

Independent claims 9, 18, 20, and 27 are allowable over Ross for similar reasons as those stated for claim 1.

With respect to independent claim 24, Ross does not disclose running a sand screen into a particular length of a well, and extending a fiber optic line into *the particular length* of the well. Again, as disclosed by Ross, the sensor 78 is positioned some distance above the screen 26, as shown in Figure 1B. Any fiber optic line that is run to the sensor 78 does not extend along the length of the well that the sand screen extends to. Therefore, Ross also does not disclose the subject of claim 24.

Claims 1-17 and 20-23 were also rejected as being anticipated by Langseth. Sensors 46 shown in Langseth are not disposed *in* a screen. Note that the sensors 46 are disposed some distance away from screens (Figure 1 of Langseth) or right below a screen (Figure 2 of Langseth), but never in a screen. This is true also of the other sensors disclosed in Langseth, such as a flow meter 48 or a fluid identifier 50. Therefore, claim 1 is not disclosed by Langseth.

Independent claims 9, 18, 20, and 27 are allowable over Ross for similar reasons as those stated for claim 1.

Further, respect to independent claim 27, Langseth does not disclose a service string adapted to perform sand-control pumping and circulation operations.

Note that Langseth is assigned to the same assignee as the present application, namely Schlumberger Technology Corporation. Therefore, Langseth does not qualify as prior art under 35 U.S.C. § 103(c).

For the foregoing reasons, all independent claims are allowable over the cited references. Dependent claims are allowable for at least the same reasons as corresponding independent claims.

Allowance of all claims is respectfully requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504 (SHL.0147C1US).

Respectfully submitted,

Date: 2-26-03



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PATENT TRADEMARK OFFICE

A handwritten signature in black ink, appearing to read 'Dan C. Hu', written over a horizontal line.

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in	
In	

Main Entry: **<sup>1</sup>in**

Pronunciation: 'in, &n, &n

Function: *preposition*

Etymology: Middle English, from Old English; akin to Old High German *in* in, Latin *in*, Greek *en*

Date: before 12th century

**1 a** -- used as a function word to indicate inclusion, location, or position within limits <*in* the lake> <wounded *in* the leg> <*in* the summer> **b** : **INTO** 1 <went *in* the house>

**2** -- used as a function word to indicate means, medium, or instrumentality <written *in* pencil> <bound *in* leather>

**3 a** -- used as a function word to indicate limitation, qualification, or circumstance <alike *in* some respects> <left *in* a hurry> **b** : **INTO** 2a <broke *in* pieces>

**4** -- used as a function word to indicate purpose <said *in* reply>

**5** -- used as a function word to indicate the larger member of a ratio <one *in* six is eligible>

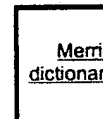
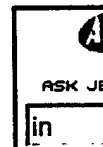
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### Pronunciation Symbols

\&\ as a and u in about	\e\ as e in bet	\o\ as aw in law
\&\ as e in kitten	\E\ as ea in easy	\oi\ as oy in boy
\&r\ as ur/er in further	\g\ as g in go	\th\ as th in thin
\a\ as a in ash	\i\ as i in hit	\(th)\ as th in the
\A\ as a in ace	\I\ as i in ice	\u\ as oo in loot
\ä\ as o in mop	\j\ as j in job	\u\ as oo in foot
\au\ as ou in out	\[ng]\ as ng in sing	\y\ as y in yet
\ch\ as ch in chin	\O\ as o in go	\zh\ as si in vision

For more information see the Guide To Pronunciation.

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